

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

August 20, 2023

Nathan Ochsner, Clerk of Court

United States of America

v.

Mario Reyes (2000/US)

Case No. 7:23-MJ-1446-1

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 18, 2023 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

18 USC § 554

*Offense Description*

Did knowingly and unlawfully export or attempt to export from the United States, any merchandise, article, or object, to wit; approximately 1,800 rounds of .50 caliber ammunition, as defined by the Commerce Control List, contrary to any law or regulation of the United States, in that the Defendant had not obtained a license or written authorization for such export, in violation of Title 50, United States Code, Section 4819(2), and Title 15, Code of Federal Regulations, Section 730 et seq., all in violation of Title 18, United States Code, Section 554

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Roberto Lopez

Submitted by reliable electronic means, sworn to  
 and attested to telephonically per Fed. R. Cr. 4.1,  
 and probable cause found on:

Date: August 20, 2023 at 2:02 p.m.City and state: McAllen, Texas/s/ Nicholas C. Stott*Complainant's signature*Nicholas C. Stott, HSI Special Agent*Printed name and title**Judge's signature*J. Scott Hacker*Printed name and title*

**Attachment "A"**

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On August 18, 2023, Texas Department of Public Safety (DPS) initiated a traffic stop on Mario Reyes ("REYES"), a United States citizen, for a traffic violation in McAllen, Texas. REYES consented to a search of the vehicle, and approximately 1,800 rounds of .50 caliber ammunition were located in the vehicle.
2. HSI Special Agents (SA) interviewed REYES, who stated the .50 caliber ammunition was purchased in his name and he knew the .50 caliber ammunition was to be illegally exported into Mexico. REYES stated he knew it was illegal to export firearms and ammunition into Mexico and he did not have a license to export the firearms and ammunition from the United States. REYES stated he had delivered .50 caliber ammunition to others for illegal exportation into Mexico on multiple occasions.
3. The ammunition is a controlled item contained within the Commerce Control List.